



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JPM/DEL  
F.# 2020R00637

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 4, 2022

By ECF and E-mail

The Honorable James R. Cho  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Benjamin Castellazzo  
Criminal Docket No. 21-466 (DG) (JRC)

Dear Judge Cho:

The government respectfully submits this letter in response to defendant Benjamin Castellazzo's application for pretrial release dated March 3, 2022 ("Def. Motion"). See ECF Dkt. No. 245 (filed partially under seal). The sealed submissions and redacted portions indicate that the defendant is experiencing significant health conditions requiring acute care. After consulting with defense counsel concerning the proposed bail package, the government does not oppose the defendant's pretrial release on the proposed bond in the amount of \$3.1 million, secured by five suretors<sup>1</sup> and their proposed properties as collateral and the following conditions:

- Travel restricted to New York and New Jersey;
- No contact with any victims or witnesses in the above-captioned case;
- No travel to the office of the Labor Union described in the Indictment;
- Surrender passport by 3/14/2022 and no future applications;

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<sup>1</sup> The defendant proposed six suretors, but government objects to one proposed suretor given his connections to members of organized crime.

- The government is also conferring with Pretrial Services about any other necessary conditions and will apprise the Court and parties as to any required modifications.

BREON PEACE  
United States Attorney

cc: Clerk of Court (JRC)  
Jennifer R. Louie Jeune, Esq. (counsel for the defendant)  
Kestine Thiele, Esq. (counsel for the defendant)